1	WRIGHT, FINLAY & ZAK, LLP Darren T. Brenner, Esq. Nevada Bar No. 8386		
2			
3	Stephanie A. Garabedian, Esq. Nevada Bar No. 9612		
4	7785 W. Sahara Ave., Suite 200		
5	Las Vegas, NV 89117 (949) 477-5050; Fax: (702) 946-1345		
6	dbrenner@wrightlegal.net		
7	sgarabedian@wrightlegal.net Attorneys for Defendant, Hartford Fire Insurance	e Company	
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	SALVADOR PLASCENCIA, individually; and	Case No.: 2:22-cv-01420-GMN-MDC	
11	KYLE HAIL, individually,		
12	Plaintiffs,	DISCOVERY PLAN AND	
13	VS.	SCHEDULING ORDER	
14	HARTFORD FIRE INSURANCE COMPANY, a Connecticut Corporation; DOES, I through X,		
15	inclusive; ROE BUSINESS ENTITIES, I		
16	through X, inclusive,		
17	Defendants.		
18			
19	Salvador Plascencia and Kyle Hail (Plain	ntiffs), and Defendant, Hartford Fire Insurance	
20	Company (Hartford), (collectively, the Parties), by and through their counsel of record, hereby		
21	submit this Stipulated Discovery Plan and Scheduling Order pursuant to the Court's Order. ECI		
22	30.		
23	A. Statement Specifying the Discovery Con	mpleted:	
24	The Parties conducted the Fed. R. Civ. F	P. 26(f) conference on November 3, 2022. Or	
25	November 16, 2022, the Court entered its initial Discovery Plan and Scheduling Order [ECF No		
26	15].		
27	To date, the Parties have completed the following discovery:		
28	Plaintiffs' Initial Disclosures were served on November 30, 2022;		

• Hartford's Initial Disclosures were served on December 5, 2022;

_	
2	<ul> <li>Plaintiffs' First Supplemental Disclosures were served on January 27, 2023;</li> </ul>
3	• Kyle Hail's Interrogatories to Hartford were served on February 8, 2023;
4	Salvador Plascencia's Interrogatories to Hartford were served on February 8
5	2023;
6	• Plaintiffs' Requests for Production to Hartford were served on February 8, 2023;
7	Hartford's Interrogatories to Salvador Plascencia were served on March 13, 2023
8	<ul> <li>Hartford's Interrogatories to Kyle Hail were served on March 13, 2023;</li> </ul>
9	Hartford's Requests for Production of Documents to Kyle Hail were served or
10	March 13, 2023;
11	Hartford's Requests for Production of Documents to Salvador Plascencia wer
12	served on March 13, 2023;
13	Hartford's Requests for Admissions to Kyle Hail were served on March 13, 2023
14	Hartford's Requests for Admissions to Salvador Plascencia were served on Marc
15	13, 2023;
16	<ul> <li>Hartford's First Supplemental Disclosures were served on April 17, 2023;</li> </ul>
17	Hartford's Responses to Plaintiffs' Requests for Production were served on Apr.
18	17, 2023;
19	Hartford's Responses to Kyle Hail's Interrogatories were served on April 17, 2023
20	Hartford's Responses to Salvador Plascencia's Interrogatories were served o
21	April 17, 2023;
22	<ul> <li>Hartford subpoenaed records from Concentra on May 5, 2023;</li> </ul>
23	<ul> <li>Hartford subpoenaed records from Desert Radiology on May 5, 2023;</li> </ul>
24	<ul> <li>Hartford subpoenaed records from Desert Orthopaedic Center on May 5, 2023;</li> </ul>
25	Kyle Hail's Responses to Hartford's Requests for Production were served on Ma
26	10, 2023;
27	Salvador Plascencia's Responses to Hartford's Interrogatories were served on Ma
28	10, 2023;

1	Salvador Plascencia's Responses to Hartford's Requests for Admission were
2	served on May 10, 2023;
3	Kyle Hail's Responses to Hartford's Requests for Admission were served on Mag
4	10, 2023;
5	Kyle Hail's Responses to Hartford's Interrogatories were served on May 10, 2023
6	Salvador Plascencia's Responses to Hartford's Requests for Production were
7	served on May 10, 2023;
8	<ul> <li>Plaintiffs' Second Supplemental Disclosures were served on May 12, 2023</li> </ul>
9	<ul> <li>Hartford's Second Supplemental Disclosures were served on June 28, 2023;</li> </ul>
10	Salvador Plascencia's Supplemental Responses to Hartford's Interrogatories were
11	served on June 28, 2023;
12	<ul> <li>Hartford subpoenaed records from Southern Hills Hospital on June 29, 2023;</li> </ul>
13	<ul> <li>Plaintiffs' Third Supplemental Disclosures were served on June 29, 2023;</li> </ul>
14	<ul> <li>Hartford deposed Salvador Plascencia on June 30, 2023;</li> </ul>
15	• Hartford subpoenaed records from Achieve Physical Therapy on June 30, 2023;
16	<ul> <li>Hartford's Third Supplemental Disclosures were served on July 12, 2023;</li> </ul>
17	<ul> <li>Hartford deposed Kyle Hail on September 1, 2023;</li> </ul>
18	Hartford's Second Requests for Production of Documents to Kyle Hail were
19	served on September 5, 2023;
20	<ul> <li>Hartford's Fourth Supplemental Disclosures were served on October 2, 2023;</li> </ul>
21	<ul> <li>Plaintiffs' Initial Expert Disclosures were served on January 25, 2024;</li> </ul>
22	<ul> <li>Hartford's Initial Expert Disclosures were served on January 25, 2024;</li> </ul>
23	Hartford's Third Set of Production of Documents were served upon Kyle Hail or
24	February 13, 2024;
25	<ul> <li>Hartford's Rebuttal Expert Disclosures were served on February 28, 2024;</li> </ul>
26	<ul> <li>Plaintiffs' Rebuttal Expert Disclosures were served on February 28, 2024;</li> </ul>
27	Kyle Hail's Responses to Hartford's Third Set of Production of Documents were
28	served on March 14, 2024;

1	<ul> <li>Plaintiffs deposed Hartford employee Sarah Grossman on March 21, 2024;</li> </ul>	
2	<ul> <li>Plaintiffs' First Supplement to Initial Expert was served on March 27, 2024;</li> </ul>	
3	Hartford's Fifth Supplemental Disclosure was served on March 27, 2024; and	
4	Hartford's Sixth Supplemental Disclosure was served on June 7, 2024.	
5	B. Specific Description of the Discovery that Remains to be Completed:	
6	The Parties need to conduct the following discovery:	
7	• Deposition of Fed. R. Civ. P. 30(b)(6) Witness for Hartford;	
8	Deposition of various fact witnesses and experts; and	
9	Such other discovery that may be deemed necessary or appropriate.	
10	C. A proposed schedule for completing all remaining discovery.	
11	The Parties request that the current deadlines in the Scheduling Order [ECF No. 15] as	
12	amended by later Orders [ECF Nos. 20 and 24] be extended as follows:	
13	1. Last Day to Amend Pleadings or Add Parties: currently July 3, 2023; closed, no	
14	change;	
15	2. Last Day to Disclose Initial Expert Report: currently January 25, 2024; closed, no	
16	change;	
17	3. Last Day to Disclose Rebuttal Experts: currently February 28, 2024; closed, no	
18	change;	
19	4. Last Day to Complete Discovery: currently June 3, 2024; desired December 30,	
20	2024;	
21	5. Last Day to File Dispositive Motions: currently July 3, 2024, desired January 30,	
22	2025;	
23	1.1.1	
24	1.1.1	
25		
26		
27		
28		

## 

1 6. Last Day to File Joint Pre-Trial Order: currently August 2, 2024, desired March 4, 2 2025. In the event dispositive motions are filed, the date for filing the joint pretrial 3 order shall be suspended until thirty (30) days after a decision of the dispositive 4 motions. The disclosures required by FRCP 26(a)(3), and any objections thereto, shall 5 be included in the pretrial order. IT IS SO STIPULATED. 6 7 DATED this 14th day of June 2024. DATED this 14th day of June, 2024. 8 MAIER GUTIERREZ & ASSOCIATES WRIGHT, FINLAY & ZAK, LLP 9 /s/ Joseph A. Gutierrez /s/ Stephanie A. Garabedian 10 Joseph A. Gutierrez, Esq. Darren Brenner, Esq. Nevada Bar No. 9046 Nevada Bar No. 8386 11 Stephen G. Clough, Esq. Stephanie A. Garabedian, Esq. 12 Nevada Bar No. 10549 Nevada Bar No. 9612 8816 Spanish Ridge Avenue 7785 W. Sahara Ave., Suite 200 13 Las Vegas, NV 89148 Las Vegas, NV 89117 Attorneys for Plaintiffs, Kyle Hail Attorneys for Defendant, Hartford Fire 14 and Salvador Plascencia Insurance Company 15 IT IS SO ORDERED. 16 Dated this 18th day of June, 2024. 17 18 Hon. Maximiliano Ib Couvillier III 19 UNITED STATES MAGISTRATE JUDGE 20 21 22 23 24 25 26 27 28